

**Remarks**

The office action of January 6, 2005, has been carefully reviewed. This paper is responsive thereto.

Claims 1-26 were pending at the time of the office action. New dependent claim 27 has been added. No new matter has been entered.

**Interview of March 24, 2005**

Applicants wish to thank the Examiner and his primary for the interview of March 24, 2005. While no agreement was reached, the above amendments are believed to place the application in condition for allowance.

**Oral Election of November 24, 2004**

On November 24, 2005, in response to a discussion with Examiner Nguyen, Applicants' representative orally elected claims 1-10. Examiner Nguyen discussed the need for a restriction based on the separate grouping of claims as follows:

- Group I: Claims 1-10
- Group II: Claims 11-16
- Group III: Claims 17 and 18
- Group IV: Claim 19-26

Applicants elected to pursue Group I. In response to Applicants' election, Applicants have filed three divisional applications to non-elected Groups II, III, and IV.

Accordingly, Applicants address the rejections as related to elected claims 1-10 as the other claims have been previously withdrawn.

**Objection to the Specification**

The Examiner objects to the specification for misidentified drawing references on page 20. Applicants have amended paragraph 75 to address the Examiner's concerns. The objection is believed overcome.

**Rejection of Claims under 35 U.S.C. § 101**

Claims 1-10 stand rejected under 35 U.S.C. § 101 as relating to non-statutory subject matter. Applicants draw the Examiner's attention to MPEP 2106 2(a) relating to statutory product claims. Also, see *In re Lowrey* 32 F.3d at 1583, 32 U.S.P.Q.2d 1034-1035. As the claims are statutory per MPEP 2106, Applicants request the rejection under 35 U.S.C. § 101 be withdrawn.

**Rejection of Claims under 35 U.S.C. § 103 over Hansen in view of Capps**

In light of the above withdrawal of claims, claims 1-5 and 8-10 stand rejected under 35 U.S.C. § 103 over Hansen in view of Capps. Applicants traverse.

Claim 1 recites, *inter alia*:

“ a first portion storing data; and  
a second portion storing a first mapping of the data to a virtual space,  
wherein said first mapping is of the form of:  
 $X' = ax + by + c$   
 $Y' = dx + ey + f$   
and a second mapping to said output space is of the form of:  
 $X'' = gx' + hy' + i$   
 $Y'' = jx' + ky' + m$   
wherein said first mapping and said second mapping are as:  
 $X'' = (ga + hd)x + (gb + he)y + gc + hf + i$   
 $Y'' = (ja + kd)x + (jb + ke)y + jc + kf + m.$ ”

The Examiner relies on Hansen to teach ink data. Next the Examiner relies on Capps to suggest a virtual ink space. Capps, in fact, fails to teach or suggest a virtual ink space. Rather, Capps merely shows a transformation. There is no virtual ink space as claimed in Capps. Column 12, lines 7-14 and 28-33 indicate that each stroke needs to be adjusted to put the upper left corner at the origin, “Otherwise, the scaling may cause distortion of the graphical object.” See column 12, lines 31-33. Instead of a virtual ink space, Capps teaches how to scale graphical data but is limited to normalizing all graphical data to the origin. This means that all graphical information will not be as a user intended, but regimented to having the origin at the upper left corner of all

information. In other words, all graphical information will then overlap in the lower right quadrant of any ink space. As this is not the intent of Capps, no ink space can therefore be taught by Capps. As there is no virtual ink space in Capps, and the Examiner admits Hansen fails to teach or suggest this recitation, the combination of Hansen and Capps fails to teach or suggest this aspect of the claimed invention.

Accordingly, claim 1 is allowable over the combination. Claims 2-5 and 8-10 are believed allowable as being dependent on claim 1.

**Rejection of Claims under 35 U.S.C. § 103 over Hansen in view of Capps and in further view of Baxes**

Claims 6 and 7 stand rejected over Hansen in view of Capps in further view of Baxes. Applicants traverse.

Claim 7 has been cancelled.

As to claim 6, Capps as described above fails to teach or suggest a virtual ink space as claimed. According to the Examiner, Baxes teaches equations that may be used with Capps. As Capps fails to teach or suggest the virtual ink space as claimed and, in fact teaches away from the use of a virtual ink space by normalizing all graphical data to the origin. Because of this aspect of Capps, the combination cannot be applied as suggested by the Examiner, irrespective of the teachings of Baxes as one would not have been motivated to combine references that teach away from the invention. Accordingly, claim 6 is believed allowable over the combination of references.

The application is believed to be in condition for allowance as all objections and rejections have been addressed.

Dresevic – U.S. Patent Serial No. 09/891,512

Should the Patent and Trademark Office determine that a fee is required, please charge our Deposit Account No. 19-0733.

Respectfully submitted,

**BANNER & WITCOFF, LTD.**

By: \_\_\_\_\_



Christopher R. Glembocki  
Registration No. 38,800

1001 G. Street, N.W.  
Washington, D.C. 20001-4597  
(202) 824-3000  
Dated: March 7, 2005